



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL
AND PUBLIC AFFAIRS

February 16, 2015

Joe Hudson, District Ranger
Moose Creek Ranger District
831 Selway Road
Kooskia, ID 83539

Dear Mr. Hudson:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (DEIS) for the proposed Johnson Bar Fire Salvage Project on the Moose Creek Ranger District of the Nez Perce-Clearwater National Forests (EPA Project Number 14-0057-AFS). Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

The FEIS analyzes the Forest Service's proposal to salvage trees (commercial timber harvest and temporary road construction) which were killed in the 2014 Johnson Bar wildfire, and conduct watershed improvement activities (road decommissioning and storage). The purpose of the project is to recover economic value, achieve desired age and size classes, trend tree species composition toward more resilient species, and to reduce road related impacts to aquatic species and the watersheds. Three action alternatives and a no action alternative were analyzed. Alternative 4 has been selected as the Preferred Alternative. Treatments under Alternative 4 include harvesting on 2,207 acres, of which 100 acres would utilize tractor logging, 1,352 acres would utilize skyline logging, and 755 acres would be through helicopter logging. Alternative 4 would harvest fewer acres than Alternative 2 (the proposed alternative in the DEIS), and would eliminate harvest within or seen from the Wild and Scenic River Corridor. Road related activities under Alternative 4 would include 16.9 miles of system haul road reconstruction (including road stabilization and culvert installation and replacement); 3.4 miles of new and existing temporary roads; and 14 new and existing helicopter landings.

In our May 2015 comments on the DEIS, we indicated support for the project, but recommended the inclusion of additional information about herbicide application and associated project design criteria in the FEIS. We also raised questions about long-term landscape structure (in terms of spatial and species complexity and the mix of seral stages).

We believe the FEIS is responsive to our concerns and recommendations related to invasive treatment. In particular, we appreciate the decision to include weeds within the Design Criteria. Some of our questions about planting density and long term landscape structure were deemed to be outside of the scope of analysis for the FEIS. The EPA maintains that although the proposed planting density of 300 to 400 trees per acre is below the traditional stocking level of 600 trees per acre, it still may be outside the historic range of variability (HRV). A 2014 Forest Service science synthesis¹ found that of 15 estimates of historic small, medium, and large tree stand densities from different dry and moist mixed conifer types and environments (based on seven total studies), 12 estimates fell within the range of 16 to 70

¹ http://www.fs.fed.us/pnw/pubs/pnw_gtr897.pdf

trees per acre. Furthermore, if planting is applied uniformly across the treated acres, the result may be coarser grained, more homogenous patch types (which may be more susceptible to high-severity fire). As the FEIS and ROD are finalized, we encourage the Forest to consider historic tree densities and how the proposed project fits within the historic range of variability. If proposed planting densities (accounting for anticipated mortality) fall outside the HRV, we recommend the ROD provide direction as to how plantation density will be managed.

We appreciate the opportunity to review and comment on the FEIS. If you have any questions about our review, please contact me at (206) 553-1601, or by electronic mail at littleton.christine@epa.gov, or you may contact Teresa Kubo of my staff at 503-326-2859 or by electronic mail at kubo.teresa@epa.gov

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Littleton". The signature is written in a cursive, flowing style.

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit